

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

FILED

FEB 13 2019

Matthew Thibault
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT STAPLES, JR.,

Defendant.

CR 19-30020

REDACTED INDICTMENT


INVOLUNTARY MANSLAUGHTER
and CHILD ABUSE

18 U.S.C. §§ 1153, 1112, and
3559(f), and SDCL 26-10-1

The Grand Jury charges:

COUNT I

On or about the 14th day of September, 2018, in Todd County, in Indian country, in the District of South Dakota, Robert Staples, Jr., an Indian, unlawfully killed a human being, [Name Redacted], without malice, in the commission of a lawful act in an unlawful manner which might produce death. Such act was committed in a grossly negligent manner, with actual knowledge that his conduct was a threat to the lives of others or with actual knowledge that would reasonably enable him to foresee the peril to which his act might subject another, to-wit: Robert Staples, Jr, did unlawfully kill [Name Redacted] by operating a vehicle in a grossly negligent manner and did thereby commit the crime of involuntary manslaughter, in violation of 18 U.S.C. §§ 1153, 1112, and 3559(f).



COUNT II

On or about the 14th day of September, 2018, in Todd County, in Indian country, in the District of South Dakota, Robert Staples, Jr., an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not attained the age of seven, in violation of 18 U.S.C. § 1153 and SDCL 26-10-1.

COUNT III

On or about the 14th day of September, 2018, in Todd County, in Indian country, in the District of South Dakota, Robert Staples, Jr., an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not attained the age of seven, in violation of 18 U.S.C. § 1153 and SDCL 26-10-1.

A TRUE BILL:

NAME REDACTED

Foreperson

RONALD A. PARSONS, JR.
United States Attorney

By: 